

Exhibit A

Date	Event	Docket ¹
February 15, 2019	Red Tree commences these actions through motions for summary judgment in lieu of complaint filed in New York Supreme Court.	1/1
March 21, 2019	Defendants remove the actions to federal court.	1/1
March 27, 2019	Defendants move to stay both actions.	9/10
April 11, 2019	Red Tree refiles the state-court summary-judgment motions on the federal dockets.	24/25
May 6, 2019	The district court stays the cases for 120 days.	33/33
September 26, 2019	Defendants move for an additional 120-day stay, or, in the alternative, to take additional discovery under Federal Rule 56(d) before being required to respond to Red Tree's summary judgment motions.	49/49
January 14, 2020	The district court denies the additional stay Defendants seek, citing Red Tree's "interest in proceeding expeditiously with this litigation" and the "prejudice to [Red Tree]," which has "grown as the litigation [was] further delayed." No. 19 Civ. 2519, Dkt. 57, at 5. The district court permits Defendants to "more fully brief" their Rule 56(d) motions for additional discovery.	57/58
February 24, 2020	Defendants' Rule 56(d) motions are fully briefed and ready for decision.	70/71
May 26, 2020	Red Tree writes to inform the district court that 90 days have passed since Defendants' Rule 56(d) motions were fully briefed.	71/72
August 17, 2020	Red Tree learns from review of the docket that both cases are incorrectly marked as "stayed" in the district court's CM/ECF system. It informs the district court of the incorrect "stayed" designation and asks the district court to remove the "stayed" designation.	74/75
August 21, 2020	The district court orders the "stayed" designation removed.	75/76
August 24, 2020	Red Tree informs the district court that 180 days have passed since Defendants' Rule 56(d) motions were fully briefed.	76/77

¹ Unless otherwise indicated, this chronology cites docket numbers from the two cases as "Dkt. #/#," in which the first docket number refers to the entry in No. 19 Civ. 2519, followed by the entry in No. 19 Civ. 2523.

Date	Event	Docket ¹
September 29, 2020	Red Tree files a letter informing the district court that, in the interest of advancing the case, it has voluntarily produced all documents which Defendants sought in their Rule 56(d) motions. As a result, Red Tree argues, the Rule 56(d) motions are moot, and Defendants should be required to respond to Red Tree's summary-judgment motions.	84/85
September 30, 2020	The district court orders Defendants to respond to Red Tree's September 29 letter.	85/86
October 5, 2020	Defendants respond to Red Tree's September 29 letter and argue that they need more third-party discovery before they can respond to Red Tree's summary-judgment motions.	86/87
November 23, 2020	Red Tree writes the district court to offer to attend a status conference on the Rule 56(d) motions, noting that those motions have been fully briefed for nine months.	89/90
January 25, 2021	Red Tree moves to intervene in <i>Dresser-Rand Co. v. Petróleos de Venezuela, S.A., et al.</i> , No. 19 Civ. 2689, a parallel case against PDVSA before Judge Stanton, for the purpose of accessing third-party discovery taken in that case which mirrors one of Defendants' additional discovery requests in these cases. Red Tree writes the district court to inform the court of its motion in <i>Dresser-Rand</i> .	91/92
January 27, 2021	Defendants inform the district court that they do not oppose Red Tree's motion in <i>Dresser-Rand</i> .	92/93
March 18, 2021	Red Tree learns from the Clerk of Court that Defendants' Rule 56(d) motions were incorrectly marked as "terminated" in the district court's internal records. At the Clerk's instruction, Red Tree leaves a message on the district court's chambers voicemail informing the court of the erroneous "terminated" designation. Red Tree also writes to inform the district court of this error, requesting that the court remove the erroneous "terminated" designation and resolve Defendants' Rule 56(d) motions as soon as practicable.	94/95
March 25, 2021 – April 6, 2021	Red Tree contacts the Clerk of Court to inquire about the status of the motions. The Clerk confirms that the motions are still marked "terminated." The Clerk also informs Red Tree that the motions were marked "terminated" on September 29, 2020 at the direction of the district court's chambers.	
May 5, 2021	Red Tree leaves a second voicemail on the district court's chambers voicemail informing the court that the Rule 56(d) motions were still marked as "terminated."	

Date	Event	Docket ¹
May 28, 2021	Red Tree files a petition for a writ of mandamus directing the district court to (1) reinstate the Rule 56(d) motions and motions for summary judgment, and (2) resolve the Rule 56(d) motions in a reasonable period of time.	21-1390 (2d Cir.) Dkt. 1
June 1, 2021	The district court grants the Rule 56(d) motions and restores the motions for summary judgment. Close of fact discovery is scheduled for July 1, 2021.	99/100
June 2, 2021	The parties file a joint stipulation withdrawing the petition for a writ of mandamus.	21-1390 (2d Cir.) Dkt. 10
June 8, 2021	Defendants request an extension of the deadline to complete discovery to July 8, 2021.	101/101
June 9, 2021	The district court grants Defendants' request to extend the deadline to complete fact discovery and orders the parties to complete briefing for the summary judgment motions by August 5, 2021.	102/102
July 7, 2021	The district court grants Defendants' second request to extend the close of fact discovery and sets the following schedule: (1) domestic discovery to be completed by July 15, 2021; (2) foreign discovery to be completed by August 2, 2021; and (3) summary judgment briefing to be completed by August 30, 2021.	112/113
July 9, 2021	The district court grants Defendants' request to issue letters rogatory and letters of request for foreign discovery.	113/114
August 16, 2021	Defendants file their opposition to Red Tree's motions for summary judgment.	119/120
August 30, 2021	Red Tree files its replies in support of its motions for summary judgment.	124/125
November 29, 2021	Pursuant to the Judge Nathan's individual practices, Red Tree informs the district court that 90 days have passed since its summary judgment motions were fully submitted.	129/130
December 10, 2021	These actions are reassigned to the Hon. P. Kevin Castel.	